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March 20, 2024

VIA ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: *Kitchen Winners NY Inc. v. Rock Fintek LLC*,
Case No. 22-cv-05276-PAE
Our File No: 5529.0002

Dear Judge Englemayer:

This firm represents Plaintiff/Counterclaim Defendant Kitchen Winners NY Inc., and Third-Party Defendants Adorama Inc., and Joseph Mendlowitz (collectively “Defendants”). We write to respectfully request a brief of extension of time for Defendants to file their reply memoranda of law in connection with Defendants’ Motions for Summary Judgment.


Third-Party Defendants JNS Capital Holdings LLC and Joel Stern (collectively, the “Stern Defendants”) join in this request and seek a brief of extension of time to file their reply memorandum of law in connection with Stern Defendants’ Motions for Summary Judgment.

Defendants’ and the Stern Defendants’ reply submissions are currently due on March 29, 2024. (ECF No. 134.) Counsel for both Defendants and the Stern Defendants have a number of substantial motions that are due in the next week and a half, and, therefore, respectfully request a one-week extension of time to submit their reply papers. Should the Court grant this request, the replies would be due and submitted on April 5, 2024.

This is the first request for an extension of time with respect to the Motions for Summary Judgment. Counsel for Rock Fintek LLC has indicated that Rock Fintek LLC has no objection to this request. We thank the Court for its continued attention to this action.

Respectfully,

LIPSIUS-BENHAIM LAW, LLP


Alexander J. Sperber, Esq.